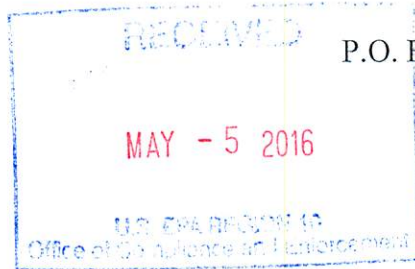


Confidential Business Information

EPA Region 10
Deemed Releasable

Shell Oil Products US
8505 South Texas Road (Deliveries)
P.O. Box 622 Anacortes, WA 98221-0622
Tel: 1 360 293 0800
Fax: 1 360 293 0808

May 2, 2016



Javier Morales
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101

Re: Request for Information regarding the facility located at 8505 South Texas Road, Anacortes, Washington.

Dear Mr. Morales,

This letter and the attached documents are being provided by Shell Oil Products Puget Sound Refinery (the "Company") in response to your Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, WA received on April 5, 2016. The Company understands this request was to obtain further information subsequent to the U.S. Environmental Protection Agency ("EPA") Risk Management Program ("RMP") inspection that was conducted the week of August 10, 2015. Please find the Company's responses to your requests below and the attached relevant documentation with a Statement of Certification having been signed by a duly authorized officer.

Please note that certain information that Shell is providing constitutes confidential trade secrets and commercial or financial information ("Confidential Business Information" or "CBI") exempted from public disclosure under 5 U.S.C. § 552(b)(4) and subject to a claim of confidentiality under 40 C.F.R. § 2.208. Confidential business information gathered under the authority of Section 114 of the Clean Air Act is subject to 40 CFR § 2.301 and appropriate steps should be taken to properly safeguard the information. 40 C.F.R. § 2.211. We have marked specific documents as CBI where appropriate. Please treat these documents and the information they contain as confidential, as provided by the Freedom of Information Act or equivalent state law.

Supplemental Request 1: Provide the date each spent acid tank TK-402 and TK-403 was installed at the facility. Provide supporting documentation.

RESPONSE:

In response to this request, the Company is providing documentation providing tank installation dates in Bates-labeled PSR06959 and tank construction drawing in Bates-labeled PSR06960.

Supplemental Request 2: Provide the written operating procedures required by 40 C.F.R 68.69 for the ammonia storage tank as follows:

- a. The written operations procedures currently in effect, along with the date the operating procedures went into effect.
- b. The written operating procedures in effect on August 10, 2015, along with the date the operating procedure went into effect.
- c. All written operating procedures that were in effect in between the dates referred subparagraphs (a) and (b) above. Provide supporting documentation.

RESPONSE:

In response to this request, the Company is providing operating procedures currently in effect (a) for Ammonia Unloading in Bates-labeled PSR06961 through PSR06966 and written operating procedures in effect (b) on August 10, 2015 in Bates-labeled PSR06967 through PSR06972. The written operating procedures currently in effect (a) for Ammonia Tank Shutdown is provided in Bates-labeled PSR06973 through PSR06976 and written operating procedures in effect (b) on August 10, 2015 in Bates-labeled PSR06977 through PSR06980. No other written operating procedures for Ammonia Unloading and Ammonia Tank Shutdown were in effect (c) between the dates referred in subparagraphs (a) and (b) above.

The Company is providing written operating procedure currently in effect for Ammonia Leak in Bates-labeled PSR06981 through PSR06982. No other written operating procedure for Ammonia Leak was in effect (a) on August 10, 2015. No other written operating procedure for Ammonia Leak was in effect (c) between the dates referred in subparagraphs (a) and (b) above.

The Company is providing written operating procedure currently in effect for PIS Mitigation Plan Cogen Ammonia Area Monitor with Auto Deluge and Ammonia Cutoff in Bates-labeled PSR06983 through PSR06984. No other written operating procedure for PIS Mitigation Plan Cogen Ammonia Area Monitor with Auto Deluge and Ammonia Cutoff was in effect (a) on August 10, 2015. No other written operating procedure for PIS Mitigation Plan Cogen Ammonia Area Monitor with Auto Deluge and Ammonia Cutoff was in effect (c) between the dates referred in subparagraphs (a) and (b) above.

If you have any questions regarding this information, please contact Shirley Yap, General Manager, Puget Sound Refinery at 1 (360) 293-0819.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shirley Yap', with a stylized flourish at the end.

Shirley Yap

GM, Puget Sound Refinery



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

MAR 29 2016



OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Ms. Shirley Yap
General Manager
Puget Sound Refinery
Shell Oil Products LLC
P.O. Box 622
Anacortes, Washington 98221

Re: Request for Information Regarding the Facility located at 8505 South Texas Road, Anacortes, Washington.

Dear Ms. Yap:

The U.S. Environmental Protection Agency, Region 10 (EPA) is seeking information and documents relating to the environmental conditions at the facility located at 8505 South Texas Road, Anacortes, Washington.

EPA is requesting additional information after a Risk Management Program inspection that was conducted the week of August 10, 2015. Pursuant to the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, you are hereby requested to respond to the Information Request.

In the Information Request (Enclosure 1), EPA requests information concerning processes at the facility subject to the requirements of CAA § 112(r), 42 U.S.C. § 7412(r). The enclosed Statement of Certification (Enclosure 2) should be signed by a duly authorized officer or agent and returned with the response to this Information Request.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide complete and truthful responses to this Information Request within **thirty (30) days** of your receipt of the request, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to § 113(a)(3) of the CAA. The statute permits EPA to seek the imposition of penalties of up to \$37,500 for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive may be treated as non-compliance with the Information Request. If you believe a question is not applicable to the facility, explain in detail the reason for that belief. Please be further advised that provision of false, fictitious, or fraudulent statements of representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(C)(2).

ENCLOSURE 1
CAA Section 112(r) Information Request

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request, with the number of the question to which it corresponds. A complete set of all responses should be sent to the following address:

Javier Morales
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101

2. For each question contained herein, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific request herein.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. The information requested herein must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim covering all or part of the information submitted pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414, and 40 C.F.R. Part 2, by labeling such information at the time it is submitted to EPA as "trade secret" or "proprietary" or "company confidential" or other suitable notice.

The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

B. DEFINITIONS

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or in the regulations at 40 C.F.R. Part 68.

1. The "company" refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response shall be made in relation to both.
2. The term "document" means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy,

C. INFORMATION REQUEST

Provide the following information for the facility.

1. Provide the date each spent acid tank TK-402 and TK-403 was installed at the facility. Provide supporting documentation.
2. Provide the written operating procedures required by 40 C.F.R. § 68.69 for the ammonia storage tank as follows:
 - a. The written operating procedures currently in effect, along with the date the operating procedures went into effect.
 - b. The written operating procedures in effect on August 10, 2015, along with the date the operating procedures went into effect.
 - c. All written operating procedures that were in effect in between the dates referred subparagraphs (a) and (b) above. Provide supporting documentation.

ENCLOSURE 2

Puget Sound Refinery
Shell Oil Products LLC.
P.O. Box 622
Anacortes, WA 98221

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Puget Sound Refinery, Shell Oil Products LLC are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Puget Sound Refinery, Shell Oil Products LLC under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.



Signature

Shirley Yap

Printed Name

General Manager, Shell Puget Sound Refinery

Title

April 28, 2016

Date